

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
vs.) Criminal Complaint No.
) 04-MJ-00045 LPC
JOSE MARCILIO CAVAZOS, JR.,)
DEFENDANT)

MOTION FOR RELEASE AND REQUEST FOR A HEARING REGARDING
CONTINUED PRE-TRIAL DETENTION

Now comes the defendant, Jose Marcilio Cavazos, Jr., and requests that this Court:

1. Hold a hearing regarding his continued detention pending trial of this case, and
2. After hearing, order defendant's pre-trial release on such reporting conditions to the applicable Pretrial Services Office as this Court deems appropriate pursuant to 18 U.S.C. § 3142(c)(1)(A).

Respectfully submitted,
The Defendant, by his attorney

/s/ Edward P. Ryan Jr.

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Dated: December 20, 2004